

**Rapaport Law Firm, PLLC**  
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**Carmel, NY 10512**  
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**INVOICE/STATEMENT OF  
 SERVICES**

May 29, 2020

Invoice Number: 4770


Matter Name: Manuel Pimentel v. 615 W. 176th Street LLC

Period: 1/29/2018 through 5/29/2020

**ATTORNEY SERVICES**

Professional Services by Marc A. Rapaport

			<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Karina Gulfo</u>			
1/25/2019	Karina Gulfo	Communicate (with client) A106 Spoke with client and MR over phone re. employment details	0.50 95.00/hr	47.50
1/28/2019	Karina Gulfo	Review/analyze A104 Read and edited draft complaint	0.60 95.00/hr	57.00
2/6/2019	Karina Gulfo	Communicate (in firm) A105 Drafted letter to Con Edison re. client's gas; emailed MR re. same	0.30 95.00/hr	28.50
2/11/2019	Karina Gulfo	Draft/revise A103 Reviewed draft of Complaint by MR and made further edits	1.00 95.00/hr	95.00
	Karina Gulfo	Communicate (with client) A106 Meeting with client & MR; extensive phone call with Con Edison re. [REDACTED]	1.60 95.00/hr	152.00

			Hrs/Rate	Page 2 Amount
				
2/13/2019	Karina Gulfo	Initial Document Preparation/ P400 Filed complaint, civil cover sheet and summonses on ECF	0.60 95.00/hr	57.00
2/15/2019	Karina Gulfo	Communicate (other external A108 Called ECF help desk re. notice; re-filed complaint and summonses as directed by clerk	0.60 95.00/hr	57.00
2/20/2019	Karina Gulfo	Communicate (other external A108 Wrote letter to Gotham Process re. service on Ds; requested pick up of summonses and complaints from messenger service to deliver to Gotham tomorrow	0.30 95.00/hr	28.50
3/22/2019	Karina Gulfo	Communicate (with client) A106 Meeting with client and MR	1.00 95.00/hr	95.00
4/3/2019	Karina Gulfo	Activities A100 Attention to service of process issues; meeting with MR re same; research individual def's address	1.00 95.00/hr	95.00
	Karina Gulfo	Communicate (other external A108 Attention to: continued efforts to effectuate service of pleadings on defendant Piper; telephone calls and emails with Gotham Process Service; prepare new sets of pleadings for service and provide new info. Discussion with MR re same	0.43 95.00/hr	41.17

			Hrs/Rate	Page 3 Amount
4/22/2019	Karina Gulfo	Communicate (with client) A106 Teleph call with Mr. Pimentel	0.10 95.00/hr	9.50
	Karina Gulfo	Manage data/files A110 Filed AOS for Chong Piper on ECF	0.10 95.00/hr	9.50
	Karina Gulfo	Communicate (in firm) A105 Discussion with MR; schedule meeting with Mr. Pimentel	0.27 95.00/hr	25.33
4/23/2019	Karina Gulfo	Communicate (other external A108 Comm's with Mr. Ross, attorney who was contacted by defendants	0.27 95.00/hr	25.33
4/24/2019	Karina Gulfo	Communicate (with client) A106 Met with client and MR; serve as Spanish-English interpreter in meeting	1.20 95.00/hr	114.00
4/26/2019	Karina Gulfo	Manage data/files A110 File and document mgmt	0.20 95.00/hr	19.00
	Karina Gulfo	Communicate (with client) A106 Teleph call with client and meeting with MR	0.20 95.00/hr	19.00
6/12/2019	Karina Gulfo	Manage data/files A110 Calendared deadlines; reviewed docket and downloaded Defts filings	0.30 95.00/hr	28.50
6/20/2019	Karina Gulfo	Communicate (with client) A106 Called client per MR request; 	0.27 95.00/hr	25.33

			<u>Hrs/Rate</u>	<u>Page 4 Amount</u>
7/2/2019	Karina Gulfo	Manage data/files A110 Saved notice of Defts attorney change to our files	0.08 95.00/hr	7.92
7/11/2019	Karina Gulfo	Manage data/files A110 Reviewed court order; calendared new deadline	0.07 95.00/hr	6.33
7/25/2019	Karina Gulfo	Communicate (other external A108 Emailed interpreter re. her availability for mediation	0.05 95.00/hr	4.75
7/26/2019	Karina Gulfo	Communicate (with client) A106 Spoke with client; advised him re. mediation	0.03 95.00/hr	3.17
8/20/2019	Karina Gulfo	Communicate (with client) A106 Telephone call with client; calendar deadline re. mediation	0.10 95.00/hr	9.50
8/21/2019	Karina Gulfo	Communicate (with client) A106 Met with client; translated for MR	1.70 95.00/hr	161.50
8/30/2019	Karina Gulfo	Review/analyze A104 Proofread mediation statement	0.40 95.00/hr	38.00
9/3/2019	Karina Gulfo	Communicate (other external A108 Review e-mail from interpreter Carmen Simeonides; forward same to Marc and Marcela; call with Carmen	0.10 95.00/hr	9.50
	Karina Gulfo	Manage data/files A110 Mediation prep	1.50 95.00/hr	142.50

			Hrs/Rate	Page 5 Amount
9/10/2019	Karina Gulfo	Review/analyze A104 Review docket; email MR re. status update deadline	0.20 95.00/hr	19.00
10/1/2019	Karina Gulfo	Activities A100 Meeting with client; interpret for MR; [REDACTED] e [REDACTED] [REDACTED]	1.20 95.00/hr	114.00
10/9/2019	Karina Gulfo	Discovery L300 Edit Pltf Responses to Defts 1st Req for production	1.60 95.00/hr	152.00
10/29/2019	Karina Gulfo	Manage data/files A110 Calendared new deadlines per court order document no. 34	0.08 95.00/hr	7.92
11/1/2019	Karina Gulfo	Discovery L300 worked on response to interrogatories; called client for meeting	0.75 95.00/hr	71.25
11/5/2019	Karina Gulfo	Discovery L300 Edited damages chart	0.25 95.00/hr	23.75
	Karina Gulfo	Communicate (other external A108 batestamp documents; sent discovery responses to other side	0.60 95.00/hr	57.00
11/19/2019	Karina Gulfo	Draft/revise A103 Worked on response to notice to produce & attention to production	1.00 95.00/hr	95.00
	Karina Gulfo	Draft/revise A103 edit responses to; attention to production; draft subpoena	1.37 95.00/hr	129.83

			Hrs/Rate	Page 6 Amount
12/30/2019	Karina Gulfo	Communicate (other external A108 Calls with depts' counsel	0.13 95.00/hr	12.67
1/22/2020	Karina Gulfo	Communicate (with client) A106 Call with Pimentel; email to MR re same	0.08 95.00/hr	7.92
1/29/2020	Karina Gulfo	Communicate (other external A108 Rec'd call from Shan Zu; email to MR re. same	0.05 95.00/hr	4.75
1/31/2020	Karina Gulfo	Draft/revise A103 proofread letter to court	0.20 95.00/hr	19.00
3/17/2020	Karina Gulfo	Communicate (other external A108 Call with MR re. deadline; conference call to depts' counsel; left message with Ms. Seo's assistant; advised them of deadline and court order; also that they should file their request for an extension of time	0.17 95.00/hr	15.83
4/16/2020	Karina Gulfo	Communicate (with client) A106 call with client; email to Mr re. same	0.12 95.00/hr	11.08
4/20/2020	Karina Gulfo	Communicate (with client) A106 Conference call with MR and client re. explanation of settlement	0.43 95.00/hr	41.17
4/22/2020	Karina Gulfo	Draft/revise A103 Attention to tax forms for client	0.17 95.00/hr	15.83
5/13/2020	Karina Gulfo	Draft/revise A103 Revise Cheeks letter	0.67 95.00/hr	63.33

			Hrs/Rate	Page 7 Amount
5/18/2020	Karina Gulfo	Communicate (other external A108 E-mail to depts counsel re. status of signed settlement agreement; call with MR re. same	0.27 95.00/hr	25.33
SUBTOTAL:			[ 24.21	2,298.99]
Marc Rapaport				
1/25/2019	Marc Rapaport	Communicate (with client) A106 Spoke with client over phone	0.30 400.00/hr	120.00
1/26/2019	Marc Rapaport	Pleadings L210 Draft complaint	3.00 400.00/hr	1,200.00
1/28/2019	Marc Rapaport	Pleadings L210 Review complaint with KG's edits	0.60 400.00/hr	240.00
2/1/2019	Marc Rapaport	Pleadings L210 Review KG's edits to complaint; make further edits	0.50 400.00/hr	200.00
2/11/2019	Marc Rapaport	Communicate (with client) A106 Meeting with client & KG; extensive phone call with Con Edison re. client's utilities and LLs harassment of clt.	1.60 400.00/hr	640.00
	Marc Rapaport	Draft/revise A103 Further drafting of complaint	2.50 400.00/hr	1,000.00
2/12/2019	Marc Rapaport	Researching Law C200 Legal research re: issues relating to defendants' coercive tactics with respect to plaintiff's rent-stabilized tenancy; nyc and nys rent stabil laws; fair housing precedent	2.00 400.00/hr	800.00



			Hrs/Rate	Page 8 Amount
2/15/2019	Marc Rapaport	Activities A100 Meeting with Mr. Pimentel; draft apartment rent history authorization form and obtain client's signature of same	0.50 400.00/hr	200.00
3/22/2019	Marc Rapaport	Communicate (with client) A106 Meeting with client	1.00 400.00/hr	400.00
4/3/2019	Marc Rapaport	Activities A100 Draft letter to defendants re: scheduled initial conference date; enclose copy of Judge Koeltl's individual practices and order; review affidavits of service; instruct process server to further effectuate service on individual defendant in FL	0.70 400.00/hr	280.00
4/22/2019	Marc Rapaport	Activities A100 Receive and review affidavit of service re service of process on person of suitable age reflecting service on individual defendant Piper; discussion with K Gulfo re same	0.20 400.00/hr	80.00
	Marc Rapaport	Activities A100 Telephone call to Matthew Ross, the landlord-tenant attorney for defendants; leave vm message advising of defendants' default and requesting response from him regarding whether defendants' intend to appear/respond to complaint; Ross' phone number: (212) 575-4874; discussions with K Gulfo re same	0.20 400.00/hr	80.00



			Hrs/Rate	Page 9 Amount
5/1/2019	Marc Rapaport	Communicate (other external A108 Email to Matthew Ross, Esq. with copy of letter motion filed this evening	0.20 400.00/hr	80.00
	Marc Rapaport	Draft/revise A103 Draft letter to Judge Koeltl re adjournment request	0.30 400.00/hr	120.00
	Marc Rapaport	Communicate (other external A108 Lengthy telephone call with defendants' landlord tenant counsel re: defendants are interested in discussing global settlement (including time period for client to vacate apt) and unpaid wages prior to retaining separate counsel to enter appearance in federal court; discuss adjournment of initial court dates in both eviction proceeding and federal court case	0.60 400.00/hr	240.00
5/8/2019	Marc Rapaport	Communicate (with client) A106 Teleph call with Mr. Pimentel (KG as interpreter) re settlement-related issues, including our damages calculations	0.20 400.00/hr	80.00
	Marc Rapaport	Draft/revise A103 Prepare initial damages chart for settlement purposes	1.00 400.00/hr	400.00
5/28/2019	Marc Rapaport	Activities A100 Telephone call with Mr. Chun	0.10 400.00/hr	40.00
6/11/2019	Marc Rapaport	Appear for/attend A109 Appear and attend initial conference	1.00 400.00/hr	400.00

			<u>Hrs/Rate</u>	<u>Page 10 Amount</u>
7/2/2019	Marc Rapaport	Activities A100 Receive and respond to email from Mr. Reice (mediator) re mediation	0.30 400.00/hr	120.00
7/8/2019	Marc Rapaport	Activities A100 Receive, review and sign stipulation prepared by defendants' new counsel re: extending deadline for defendants to file amended answer to complaint	0.23 400.00/hr	93.33
	Marc Rapaport	Communicate (other external A108 Call with Defts' attorney Ken Maeng	0.23 400.00/hr	93.33
8/20/2019	Marc Rapaport	Communicate (other external A108 Telephone call w/ Defts Counsel; email to mediator	0.30 400.00/hr	120.00
	Marc Rapaport	Review/analyze A104 Review of mediation rules and procedures	0.30 400.00/hr	120.00
8/21/2019	Marc Rapaport	Communicate (with client) A106 Met with client	1.70 400.00/hr	680.00
8/26/2019	Marc Rapaport	Activities A100 Attention to damages analysis for settlement purposes; meetings with KG re same; proofread and double-check calculations	1.00 400.00/hr	400.00
8/30/2019	Marc Rapaport	Activities A100 Further edits to mediation statement	2.00 400.00/hr	800.00
9/3/2019	Marc Rapaport	Plan and Prepare for A101 Extensive preparation for mediation, including review of ACRIS and DHCR records	4.00 400.00/hr	1,600.00

			<u>Hrs/Rate</u>	<u>Page 11 Amount</u>
		relating to defendants' buildings to estimate their revenues for purpose of establishing that they meet 500k threshold; review SDNY decisions re: integrated enterprise; further review of defs' document production and their wage analysis/calc's		
9/4/2019	Marc Rapaport	Appear for/attend A109 Appear and attend mediation and Foley Square Courthouse; matter not settled	3.50 400.00/hr	1,400.00
9/24/2019	Marc Rapaport	Discovery L300 Draft First Rogs and Notice to Produce to defs; draft depo notice to def. Piper	2.00 400.00/hr	800.00
10/1/2019	Marc Rapaport	Discovery L300 Meeting with Client; KG as interpreter; Prepare response to Defs' Notices to Admit	1.20 400.00/hr	480.00
10/9/2019	Marc Rapaport	Draft/revise A103 Finalize and serve Plaintiff's Response to Defs' First Req's for Admissions	0.60 400.00/hr	240.00
10/18/2019	Marc Rapaport	Communicate (other external A108 Email to defendants' counsel re discovery	0.20 400.00/hr	80.00
10/24/2019	Marc Rapaport	Activities A100 Receive and review documents from defendants' counsel relating to joint motion to extend discovery deadline; telephone calls with defendants' counsel re discovery issues; receive	0.50 400.00/hr	200.00

			<u>Hrs/Rate</u>	<u>Page 12 Amount</u>
		and review edits to proposed letter; approve same		
11/1/2019	Marc Rapaport	Discovery L300 Extensive revisions to plaintiff's response to interrogatories, including review of and corrections to itemized damages analysis/chart. Telephone call with client with KG as interpreter	1.60 400.00/hr	640.00
11/5/2019	Marc Rapaport	Activities A100 Meeting with Mr. Pimentel with K Gulfo as interpreter	0.50 400.00/hr	200.00
	Marc Rapaport	Draft/revise A103 Prepare First Requests for Admissions to Defendants; meeting with KG re: edits/proofing of same; email same to defs' counsel	1.00 400.00/hr	400.00
11/19/2019	Marc Rapaport	Discovery L300 Draft response to document demand	1.00 400.00/hr	400.00
	Marc Rapaport	Discovery L300 Draft FRCP 45 Document Subpoena to Bareburger Restaurant (defendants' tenant) and Notice of Subpoena to defendants; provide notice and copy of subpoena to defendants	1.33 400.00/hr	533.33
12/23/2019	Marc Rapaport	Communicate (other external A108 Call with Defts new counsel	0.08 400.00/hr	33.33
	Marc Rapaport	Activities A100 Telephone call with defendants' incoming atty re: defendants have failed to respond to discovery; we	0.13 400.00/hr	53.33

			<u>Hrs/Rate</u>	<u>Page 13 Amount</u>
		consent to extend all dates by 30 days		
12/23/2019	Marc Rapaport	Communicate (other external A108 Telephone call with defendants' incoming attorney re: defendants have not responded to discovery; discovery deadline is 12/31; we consent to 30 day extension; defs' counsel will file request with court	0.13 400.00/hr	53.33
	Marc Rapaport	Activities A100 Calendar agreed-upon deadlines	0.07 400.00/hr	26.67
12/30/2019	Marc Rapaport	Activities A100 Further telephone call with defendants' counsel re: defendants' refusal t cooperate with discovery	0.10 400.00/hr	40.00
	Marc Rapaport	Communicate (other external A108 Telephone call with defendants' counsel Shan Zhu re: reiterate importance of writing joint letter motion re extension of discovery deadlines	0.10 400.00/hr	40.00
1/13/2020	Marc Rapaport	Activities A100 Letter to Defendants' counsel re Defendants' failure to provide discovery	0.50 400.00/hr	200.00
1/21/2020	Marc Rapaport	Discovery L300 Review defendants' discovery responses; email to defendants' counsel re failure to provide responsive answers and documents in discovery	2.00 400.00/hr	800.00

			<u>Hrs/Rate</u>	<u>Page 14 Amount</u>
1/22/2020	Marc Rapaport	Activities A100 Lengthy comm's with defendants' counsel re discovery and settlement-related issues	0.50 400.00/hr	200.00
1/23/2020	Marc Rapaport	Activities A100 Further settlement-related comm's	0.43 400.00/hr	173.33
1/29/2020	Marc Rapaport	Activities A100 Receive and review defendants' Initial Disclosures	0.50 400.00/hr	200.00
	Marc Rapaport	Activities A100 Lengthy telephone call with defendants' counsel agreeing to discovery schedule for depositions in February	0.50 400.00/hr	200.00
	Marc Rapaport	Activities A100 Emails with defendants' counsel re defendants' retraction of agreement as to deposition schedule and related discovery issues	0.60 400.00/hr	240.00
	Marc Rapaport	Activities A100 Receive, review and respond to Defendants' disclosure of new witnesses	0.50 400.00/hr	200.00
	Marc Rapaport	Activities A100 Extensive comm's with defendants' counsel re deficiencies in defendants' disclosure of witnesses and other discovery disputes	1.50 400.00/hr	600.00
3/17/2020	Marc Rapaport	Activities A100 Receive and review court order and calendar new dates	0.10 400.00/hr	40.00

			Hrs/Rate	Page 15 Amount
3/27/2020	Marc Rapaport	Negotiation/Revision/Respon P500 Multiple settlement comm's with defendants' counsel	0.47 400.00/hr	186.67
4/8/2020	Marc Rapaport	Activities A100 Receive and review email from defendants' counsel with draft, proposed letter to court; respond to same	0.47 400.00/hr	186.67
5/13/2020	Marc Rapaport	Activities A100 Attention to Cheeks application for approval of settlement agreement; discussions with Mr. Pimentel	2.00 400.00/hr	800.00
5/28/2020	Marc Rapaport	Activities A100 Email comm's with defendants' counsel; receive and review agreement signed by defendants	0.20 400.00/hr	80.00
5/29/2020	Marc Rapaport	Activities A100 Attention to/finalize application for approval of settlement agreement and legal fees; discussions with KG re same; review history bill	1.50 400.00/hr	600.00
SUBTOTAL:			[ 52.37	20,953.32]
<u>Marcela Cabezas</u>				
1/26/2019	Marcela Cabezas	Activities A100 Telephone calls with Mr. Pimentel and meeting with MR re lawsuit	1.50 115.00/hr	172.50
4/23/2019	Marcela Cabezas	Communicate (with client) A106 Telephone calls with Mr. Pimentel	0.20 115.00/hr	23.00



		Hrs/Rate	Page 16 Amount
SUBTOTAL:		[ 1.70	195.50]
Total Amount Due for this Period		78.28	\$23,447.81
Additional Charges :			
<u>Karina Gulfo</u>			
2/13/2019	Complaint Filing Fee Court Fees E112		400.00
2/20/2019	Mess Kollektive messenger service Delivery services/messengers E107		10.00
	Sent check 4094 to gotham for NY Sec of State for service on 615 W 176th Street LLC Delivery services/messengers E107		40.00
2/26/2019	gotham process work ticket no. 1108739 for service on 615 W. 176th St. LLC Delivery services/messengers E107		50.00
2/27/2019	gotham process work ticket no. 1108740 for service on Chong S. Piper Delivery services/messengers E107		50.00
4/3/2019	Messenger service to Gotham invoice 2019-1031 Delivery services/messengers E107		13.00
	Copies of complaints for service on Piper - 2nd attempt Copying E101		6.25
4/6/2019	Service out of state on Chong S. Piper -- Gotham ticket number 1114781		175.00

		Page 17 Amount
	Delivery services/messengers E107	
7/19/2019	Court electronic records fee Court Fees E112	0.10
9/4/2019	Interpreter fee re. mediation Other professionals E123	255.00
10/23/2019	Pacer Fees Court Fees E112	0.50
11/21/2019	Process server fee re. subpoena Other professionals E123	50.00
12/23/2019	Pacer Fees Court Fees E112	0.10
12/30/2019	Pacer Fees Court Fees E112	0.20
SUBTOTAL:		[ 1,050.15]
<u>Marc Rapaport</u>		
2/12/2019	In-house copies at 0.25 per page Copying E101	82.75
	Federal Court Pacer Charges Court Fees E112	3.00
2/15/2019	SDNY Filing Fee Court Fees E112	400.00
4/3/2019	In-house copies at 0.25 per page Copying E101	5.50

		Page 18 <u>Amount</u>
4/3/2019	Federal Express, Transaction No. 930227407167 Expenses E100	17.28
7/18/2019	PACER charge (docket search) Court Fees E112	0.50
8/15/2019	Court electronic records fee Court Fees E112	0.40
8/20/2019	Court electronic records fee Court Fees E112	2.70
9/4/2019	Court electronic records fee Court Fees E112	3.30
9/10/2019	Court electronic records fee Court Fees E112	0.60
9/20/2019	Court electronic records fee Court Fees E112	0.70
11/19/2019	In-house copies at 0.25 per page Copying E101	5.00
SUBTOTAL:		[ 521.73]
Total additional charges		\$1,571.88
Total amount of this bill		<u>\$25,019.69</u>